

DEC 01 1999

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10 MS. PEIRCE: Thank you. My name is Anne
11 Peirce, and I am here today both as a member of the Nevada
12 Commission on Nuclear Projects and as a long-time resident
13 of Northern Nevada, some 30 years. I was appointed to the
14 Commission in 1985 by Governor Bryan and have been
15 actively involved with the Yucca Mountain program for over
16 a decade.

17 While the Commission on Nuclear Projects has
18 studied and commented on numerous issues involving the
19 federal high level radioactive waste program over the
20 years, I would like to focus today my remarks on just
21 three areas of concern in the Draft Environmental Impact
22 Statement.

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23 First, over the past few months the
24 Commission on Nuclear Projects has heard comments from
25 affected local governments that DOE has ignored locally
1 generated data and information in preparing the Draft EIS.
2 Several counties have apparently provided DOE with
3 up-to-date information on demographics, highway accident
4 rates, road conditions, emergency preparedness conditions,
5 socioeconomic conditions, and other areas that were not
6 utilized in the Draft Environmental Impact Statement.
7 This is a serious oversight on DOE's part and calls into
8 question the adequacy of the analyses contained in the
9 Draft Environmental Impact Statement.

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10 Secondly, the overall treatment of spent
11 nuclear fuel and high level radioactive waste

12 transportation in the Draft EIS is deficient. It is
13 unconscionable that a document of this importance and with
14 such wide-ranging import does not contain clearly
15 identified national highway and rail shipping routes for
16 moving thousands of tons of highly radioactive waste from
17 reactor locations around the country to the proposed
18 repository.

19 It is clear from the analyses contained in
20 chapter 6 of the Draft EIS and in appendix J that a
21 point-to-point analysis including a route specific
22 evaluation was carried out by DOE contractors. However,
23 nowhere in the document are the routes that would be used
24 for transporting waste to a Yucca Mountain facility
25 described or identified.

3 1 The failure to disclose shipping routes
2 effectively keeps members of the public in states and
3 communities affected by the proposed action from having
4 access to information essential for their participation in
5 the National Environmental Policy Act process. This
6 deficiency alone is sufficient to require that the Draft
7 EIS be withdrawn and reissued in a form that permits full
8 and informed public involvement as clearly intended by
9 NEPA.

4 10 While the draft itself does discuss specific
11 highway and rail shipping routes in Nevada, it is
12 nevertheless deficient in another important way. The
13 draft document does not contain analyses of routes and
14 modes sufficient to support the identification of
15 preferred alternatives. This is true for highway routes,

16 rail spur routes -- rail spur corridors and modal choices,
17 including heavy-haul intermodal alternatives.
18 Nevertheless, the statement is made in several places that
19 the Draft EIS is intended to support future decisions
20 regarding the selection of preferred routes and modes of
21 transport in Nevada.

22 I submit that DOE cannot have it both ways.
23 Either the Draft EIS contains sufficient information and
24 analyses to clearly identify and justify the selection of
25 preferred transportation alternatives or the document is
1 deficient and must be redone.

2 DOE has been putting off decisions regarding
3 the shipment of spent fuel and high level waste since the
4 initial Yucca Mountain environmental assessment was issued
5 in 1985. There is simply no excuse for not disclosing
6 preferred transportation alternatives as part of the EIS.

5 7 As a state official and also as a Northern
8 Nevada resident, I am very concerned that the Draft EIS
9 does not deal honestly and comprehensively with potential
10 transportation impacts to the Reno-Sparks metropolitan
11 area and Northern Nevada in general.

12 Given the rail spur that is proposed to be
13 constructed from just east of Carlin to Yucca Mountain, it
14 is very likely that the Reno area will experience
15 shipments of dangerous spent fuel from California and
16 perhaps even Oregon and Washington as well along the Union
17 Pacific rail line through the center of town. Yet the
18 Draft EIS does not address this issue. It does not

19 evaluate the potential impacts to the Reno area and
20 Northern Nevada, and it does not assess the costs of
21 adequately preparing for accidents or other emergencies
22 involving such shipments, including the potential for
23 terrorism and sabotage occurring in or near Reno.

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24 One final point. The Draft EIS treats Native
25 American issues and concerns in a manner that is not only
1 wholly inadequate but also condescending and insulting.
2 While acknowledging that there could be impacts to Native
3 American cultural sites along rail spur routes or at Yucca
4 Mountain, the draft document completely ignores wider
5 issues and impacts to Native peoples and communities.

6 The draft includes a discussion of the Native
7 American, quote, unquote, perspective on the project. But
8 then proceeds to discount the viewpoint expressed and goes
9 on to conclude that no significant impacts to Native
10 Americans will occur, even though no substantive impact
11 assessment work has been done in any of the Native
12 communities potentially affected by the facility or by
13 transportation routes.

14 MR. LAWSON: 30 seconds.

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15 MS. PEIRCE: In closing, I would like to join
16 the Governor, congressional delegation and others in
17 urging DOE to abandon the ill-conceived and potentially
18 devastating Yucca Mountain project and choose a realistic
19 no action alternative as the preferred alternative in the
20 Final EIS. Thank you.